



BOULT CUMMINGS  
CONNERS BERRY PLC

Henry Walker  
(615) 252-2363

Fax: (615) 252-6363

Email: hwalker@boultcummings.com

01 AUG 13 PM 4 28

August 13, 2001

EXECUTIVE SECRETARY

David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: *Generic Docket to Establish Generally Available Terms and Conditions  
for Interconnection*  
Docket No. 01-00526

Dear David:

Enclosed please find the original and thirteen copies of a Motion To Suspend Proceedings Pending Resolution of AT&T and WorldCom Arbitrations in the above-captioned proceeding. Please contact me with any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker by WLM  
Henry Walker *in permission*

HW/wlm

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In Re: Generic Docket to Establish	)	
Generally Available Terms and Conditions	)	Docket No. 01-00526
for Interconnection	)	
	)	

---

**MOTION TO SUSPEND PROCEEDINGS PENDING RESOLUTION OF AT&T AND  
WORLD COM ARBITRATIONS**

---

The Southeastern Competitive Carriers Association ("SECCA"), XO Tennessee, Inc. ("XO"), Brooks Fiber of Tennessee, Inc. ("Brooks Fiber") and MCImetro Access Transmission Services, LLC ("MCImetro"), (collectively "WorldCom"), Time Warner Telecom of the Mid-South LP ("Time Warner"), and US LEC of Tennessee ("US LEC"), (collectively the "Petitioners"), respectfully request that the Hearing Officer suspend proceedings in the above-captioned matter pending final resolution of pending arbitration proceedings between BellSouth Telecommunications, Inc. ("BellSouth") and AT&T (Docket No. 00-00309) and BellSouth and WorldCom (Docket No. 00-00079). Movants have been advised that BellSouth does not oppose this motion.

On July 30, 2001, BellSouth filed the Modified Interconnection Agreement ("Agreement") as required by the Tennessee Regulatory Authority. The other parties have been asked to file comments by August 23, 2001. The Modified Agreement may have to be further modified after all the parties conduct a detailed comparison of all prior arbitration orders and resulting agreements. Further, in order to assure a comprehensive document, different and/or multiple provisions of various agreements addressing the same issue must be considered and

analyzed, as such agreements have been impacted by previous circumstances or a particular party's business plan or position.

No party to this proceeding, except BellSouth, has participated in all TRA arbitration proceedings. Rather than undertake a review of all prior decisions, the Movants request that the TRA suspend further proceedings in this docket until after the Authority has resolved the pending AT&T and WorldCom arbitrations. Both arbitrations have been heard and briefed and all that remains is for the Authority to make its decisions and direct the parties to submit interconnection agreements consistent with those decisions.

The orders and resulting agreements will presumably incorporate language that is either (a) consistent with the Authority's findings in other, prior arbitrations or (b) reflects the Authority's current view of those issues. Either completed agreement (or a combination of the two) would serve as the best starting point for a "generic" interconnection agreement which could be further modified to include pertinent provisions from other arbitrations or provisions the Authority deems appropriate following a hearing in this docket or future arbitration proceedings; Movants expressly reserving the right in this docket to submit identical or similar issues for arbitration in a new proceeding, if they deem circumstances warrant a hearing.

Unless this motion is granted, the parties suggest that much of the work the parties are now doing could be unnecessary or moot after conclusion of the AT&T and MCI arbitrations. Therefore, the parties propose that these proceedings be temporarily suspended pending the outcome of those dockets.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker by WLM  
Henry Walker  
414 Union Street, Suite 1600 w/permission  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363

*Attorney for SECCA, XO and US LEC*

Jon Hastings by WLM  
Jon Hastings  
414 Union Street, Suite 1600 w/permission  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2306

*Attorney for WorldCom*

Charles B. Welch Jr. by WLM  
Charles B. Welch, Jr.  
Farris, Matthews, et al w/permission  
618 Church Street, Suite 300  
Nashville, Tennessee 37219  
(615) 726-1200

*Attorney for Time Warner*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this the 13<sup>th</sup> day of August, 2001.

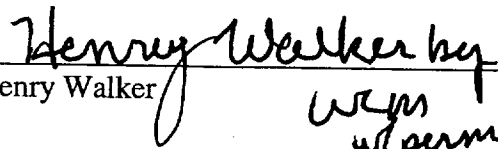
James P. Lamoureux  
AT&T  
1200 Peachtree Street, NE  
Room 4048  
Atlanta, GA 30309

Jon Hastings, Esq.  
Boult, Cummings, Conners & Berry, PLC  
414 Union Street, Suite 1600  
Nashville, TN 37219

Guy M. Hicks  
Bellsouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

Charles B. Welch, Jr.  
Farris, Mathews, et al.  
618 Church Street, Suite 300  
Nashville, TN 37219

Cynthia Kinser, Esq.  
Timothy Phillips, Esq.  
Consumer Advocate Division  
Cordell Hull Building, Second Floor  
426 Fifth Avenue North  
Nashville, TN 37243-0500

  
Henry Walker *WKM*  
*with permission*